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United States Trustee for Region 17

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA**

In re: Case No. 22-10778-A-11

Compass Pointe Off Campus DC No.: UST-1  
Partnership B, LLC,

Date: August 21, 2024

Time: 9:30 a.m.

Dept.: A

Reorganized Debtor. Courtroom: 11

**DECLARATION OF LAURIE BRUGGER IN SUPPORT OF MOTION OF THE  
UNITED STATES TRUSTEE, PURSUANT TO 11 U.S.C. § 1112(b) AND FEDERAL  
RULES OF BANKRUPTCY PROCEDURE 1017(f) AND 9014, TO CONVERT OR  
DISMISS CHAPTER 11 CASE**

I, Laurie Brugger, declare as follows:

1. I am employed as a Paralegal Specialist in the Sacramento Office of the United States Trustee, Region 17 (the "UST"). I am the Paralegal Specialist assigned to the bankruptcy proceeding of Compass Pointe Off Campus Partnership B, LLC (the "Debtor"), Chapter 11 Case No. 22-10778-A-11. I have personal knowledge of the facts set forth herein, and based on that personal knowledge, I assert that all such facts are true and correct to the best of my knowledge.

1 To the extent I base my testimony upon information and belief or upon admissible evidence  
2 other than my personal knowledge, I will specifically so state.

3 2. On June 20, 2024, I reviewed the electronic docket for this case. Based on my  
4 review, it appears that the Debtor has not filed monthly operating reports for August 2023 and  
5 September 2023. It further appears that the Debtor has not filed post-confirmation quarterly  
6 reports for the Third Quarter of 2023, the Fourth Quarter of 2023, and the First Quarter of 2024.

7  
8 3. On April 11, 2024, I was copied on an email from Jason Blumberg, a Trial  
9 Attorney for the UST, to the Debtor's counsel (Mr. Knight). Exhibit 1 hereto contains a true  
10 correct copy of this email. On April 11, 2024, I was copied on a responsive email from Mr.  
11 Knight. Exhibit 1 hereto contains a true correct copy of this email.

12  
13 4. On June 20, 2024, I accessed the Chapter 11 Quarterly Fee Information and  
14 Collection System maintained by the United States Trustee Program. In accordance with my  
15 review, I determined that the United States Trustee's records reflect that the Debtor owes  
16 quarterly fees pursuant to 28 U.S.C. § 1930(a)(6) in the estimated amount of \$24,673 through  
17 the First Quarter of 2024. Exhibit 2 hereto is a true and correct copy of the UST's records.  
18

19  
20 I declare under penalty of perjury that the foregoing is true and correct and is of my own  
21 personal knowledge and if called to do so, I would testify to same.  
22

23  
24 Executed in Sacramento, California, on June 20, 2024.

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LAURIE BRUGGER